

EXHIBIT 6

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[REDACTED]

From: Brandy Peery

Sent: Monday, August 29, 2022 10:40 AM

To: Tor Ekeland <tor@torekeland.com>; Michael Hassard <Michael@torekeland.com>; Rain Minns <rain@rainminnslaw.com>

Cc: Nicole Guitelman <nicoleg@torekeland.com>; David Apple <jdapple@applefinklaw.com>; Ricardo Cedillo <rcedillo@lawdcm.com>

Subject: Guerra v. Cantu - Dr. Guerra's RFPs to Dr. Cantu and Melody Joy Cantu

Tor-

Per my prior emails, your clients' unilateral decision not to call the individuals identified in Section 2 of Plaintiffs' Initial Disclosures as witnesses does not dispense of your clients' obligation to respond to written discovery regarding their communications with these individuals. Dr. Guerra has not and does not waive her right to call these individuals to provide deposition or trial testimony.

Melody Joy Cantu's and Dr. Cantu's objection to Dr. Guerra's RFPs Nos. 21, 23, 24, 26, 28, 29, 30 and 13, 15, 16, 18, 19, 20, 21, 22, respectively, on the grounds that such non-party "is no longer a potential witness in this matter" is not a valid objection. Please withdraw this objection to each of these RFPs and immediately advise when these documents will be produced.

Additionally, Dr. Guerra's RFP 20, 22, and 25 requests all communications between Melody Joy Cantu and non-party witnesses Danielle Wollervweron[sic], Dottie Laster, and Jackie Johnston "regarding any matter that is the subject of this lawsuit." Plaintiff objected to these requests on that such requests "seeks information and materials constituting Plaintiff's private and/or confidential information and is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence." These requests are limited to communications between Plaintiff and the non-parties that concern the subject matter of this lawsuit. As such, Plaintiff's boilerplate objections are unsubstantiated. Please withdraw these objections and immediately advise when these documents will be produced.

Furthermore, Plaintiffs testified during their depositions that they have recorded telephone calls. Please confirm that all these recordings have been produced.

Brandy C. Peery
Shareholder

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